

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

AMAZON.COM, INC. and AMAZON DATA  
SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN WATSON;  
STERLING NCP FF, LLC; MANASSAS NCP FF, LLC;  
NSIPI ADMINISTRATIVE MANAGER; NOVA WPC  
LLC; WHITE PEAKS CAPITAL LLC; VILLANOVA  
TRUST; CASEY KIRSCHNER; ALLCORE  
DEVELOPMENT LLC; FINBRIT HOLDINGS LLC;  
CHESHIRE VENTURES LLC; CARLETON NELSON;  
JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-LO-TCB

800 HOYT LLC,

Intervening Interpleader Plaintiff /  
Intervening Interpleader Counter-  
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC; BW  
HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA  
SERVICES, INC.,

Interpleader Defendants / Interpleader  
Counter-Plaintiffs.

**BRIAN WATSON’S MOTION TO COMPEL DISCOVERY**

Defendant Brian Watson (“Mr. Watson”), by counsel and pursuant to Federal Rules of Civil Procedure 26 and 37, hereby moves this Court to compel discovery from Plaintiffs

Amazon.com, Inc. and Amazon Data Services, Inc. Without appropriate justification or excuse, Plaintiffs have failed to provide adequate responses to Mr. Watson's interrogatories and requests for production, which seek information and documents necessary to the defense of the claims herein.

As detailed in the accompanying Memorandum of Law in Support of Brian Watson's Motion to Compel Discovery, the parties have met and conferred in an effort to resolve this discovery dispute and have been unable to reach a resolution.

Mr. Watson therefore seeks an order of this Court compelling Plaintiffs to respond to his interrogatories and requests for production in a manner that satisfies Plaintiffs' responsibilities under the Federal Rules of Civil Procedure.

In support of this Motion to Compel Discovery, Mr. Watson submits the accompanying Memorandum of Law in Support of Brian Watson's Motion to Compel Discovery, the Declaration of George R. Calhoun in Support of Brian Watson's Motion to Compel Discovery, and accompanying exhibits. Mr. Watson also submits a Meet-and-Confer Statement and a Proposed Order granting this Motion to Compel.

WHEREFORE, Mr. Watson respectfully requests that the Court grant his Motion to Compel.

Dated: February 11, 2022

Respectfully submitted,

/s/ Jeffrey R. Hamlin

Jeffrey R. Hamlin (VA Bar No. 46932)

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James Trusty (*pro hac vice*)

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